

## Middle Tennessee Two-way Inc

911-D Samsonite Boulevard • Murfreesboro, Tn 37129 • 615-890-6685 • Fax: 615-890-4491

May 27, 1998

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas:

The following is to inform you that I am filing in support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. I would like to take this opportunity to applaud the FCC for quickly placing the petition on public notice.

I am very interested in this proceeding because my company, Middle Tennessee Two-Way, Inc. has a vested interest in seeing that private wireless users are allocated as much spectrum as possible. We are a two-way radio communications dealer with offices in Murfreesboro and Shelbyville Tennessee, in business for the past fifteen years. We employ nine full-time employees providing a vital service to local businesses using two-way radio communication equipment.

The lack of private wireless spectrum means that we are faced with the prospect of reduced business due to the congestion of the existing spectrum. This lack of spectrum will soon cause us to turn away customers, thus causing these customers to not realize the benefits of using two-way radio communications in their businesses. These businesses will realize diminished profitability, decreased productivity, and possibly jeopardize the safety of their employees, due to the lack of radio communications.

Commercial communications systems such as cellular, PCS, and Nextel will not be able to serve the communications needs of these customers due to lack of coverage and lack of immediate accessibility to these commercial systems.

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Middle Tennessee Two-way Inc

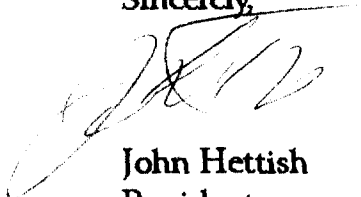
Page: 2

May 27, 1998

New spectrum allocation for private wireless users will allow Middle Tennessee Two-Way, Inc. to continue to provide future and existing customers with communications systems that increase profitability and productivity of these customers, and protect the safety of their employees.

I would like to conclude by urging the FCC to address these issues as quickly as possible, as the problems associated with the lack of spectrum are increasing.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Hettish", written over a horizontal line.

John Hettish  
President

rdj

pc: The Honorable Fred Thompson  
The Honorable Bill Frist  
The Honorable Bart Gordon

NOT FOR PUBLIC RELEASE

RM-9267  
Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington D.C. 20554

In the Matter of

Proposed Reallocation of  
420 to 430 and 440 to 450 MHz  
from the Federal Government to the  
Private Mobile Radio Service

TO: The Commission

**FORMAL COMMENTS ON**  
**PROPOSED RULE MAKING RM-9267**

**SUBMITTED BY**  
**CHARLES E. BRASHEAR, KC6YCH**  
**STANISLAUS COUNTY DEPARTMENT OF ANIMAL SERVICES**  
**DISASTER SERVICES COORDINATOR**

**MAY 27, 1998**

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### Comments on RM-9267

1. The Land Mobile Communications Council (LMCC) has submitted a proposed rule change dated April 22, 1998. The FCC has accepted the request, identifying it as RM-9267, with comments due by June 1, 1998.
2. I am the Disaster Coordinator for the Stanislaus County Department of Animal Services, and the County Emergency Coordinator for the local chapter of the Amateur Radio Emergency Service (ARES) group that supported our needs during recent emergency situations. I am also a licensed amateur radio operator.
3. Stanislaus County has benefited from the emergency services of our ARES group on two separate occasions during floods in the last year and a half.
4. Animal Control in California is not afforded a common coordinating frequency in which to coordinate our disaster coordination between agencies. ARES was instrumental in assuring a common coordinating frequency was available to tie the animal care and control agencies in our county with the Emergency Operations Center, and various command posts set up due to the disaster. Budgets in these small departments are low and better radio equipment is not usually a priority.
5. ARES operators provided both 2-meter (144-148 MHz) and 70cm (420-450 MHz) bands. Coordination was established for Animal Services/Control facilities, field units, triage area's and volunteer personnel through the 420-450 MHz Band. ARES support in disaster situations involving evacuation and animals has been critical.
6. This support is threatened by RM-9267. We believe that adoption of RM-9267 would severely threaten the future emergency support ARES can provide us, and for that reason we strongly recommend RM-9267 NOT BE ADOPTED.
7. As an amateur radio operator myself and the Emergency Coordinator of ARES, I also realize that usage of this band by any Amateur Radio Licensee would be lost.
8. This is one of the most popular amateur radio bands, probably second only to the 2-meter amateur band. A majority of the radios sold now are of the dual-band variety (144-148 MHz/420-450 MHz) most amateur radio operators own at least one of these "dual band" radios. Should RM-9267 be adopted, all of the current "Cross-Band" repeating functions (Very Useful In Emergency Situations) would be lost.
9. "EMERGENCY COMMUNICATIONS" is usually carried out by VHF/UHF bands, High Frequency Radio is used but not at the "Tactical", "Critical" stages of an emergency. RM-9267 passes, it will take away about one half of the "Local Emergency Management Capabilities" ARES and other Emergency Radio groups have to be able to help our communities during emergency or disaster.
10. In addition to the "dual band" radios and 420MHz - 450MHz (single band) radios, there are over 8000 repeaters spread across the United States. Should Amateur radio become secondary to this new widespread LMCC usage, virtually all of those repeaters, and most simplex operations, would cause interference with LMCC, and would therefore have to cease operations.
11. I realize that RM-9267 calls for amateur radio sub-bands to remain "secondary" to the newly proposed LMCC usage's. Although Amateur Radio is currently "secondary", it is actually "secondary" to a very limited use by the Federal Government. As such, Amateurs enjoy virtually unlimited use of the sub-bands, and have developed their use accordingly.
12. I ask as a licensed amateur radio operator, as a public servant, and as the Emergency Coordinator for ARES in Stanislaus County, SUPPORT LOCAL EMERGENCY OPERATIONS, PLEASE DO NOT ADOPT RM-9267.

Thank You

Charles E. Brashear KC6YCH

NOT REPLY TO THIS ORIGINAL

**RM-9267**

Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington D.C. 20554

In the Matter of  
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Private Mobile Radio Service

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**SUBMITTED BY**

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STANISLAUS COUNTY DEPARTMENT OF ANIMAL SERVICES  
DISASTER SERVICES COORDINATOR  
COUNTY EMERGENCY COORDINATOR  
STANISLAUS COUNTY AMATEUR RADIO EMERGENCY SERVICE

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Thank You

Charles E. Brashear KC6YCH

~~(NOT FOR RELEASE)~~

Eric Bond, N9VJG  
1510 Fourth Avenue  
Arnold, PA 15068-4402

May 21, 1998

RM-9267, Secretary  
Federal Communications Commission  
1919 M St NW  
Washington, DC 2055

Dear Sir/madam:

I am concerned that the recent Land Mobile Communications Council (LMCC) petition seeking access to 70 cm is incompatible with continued amateur use of the band

The loss of access to 420 to 430 and 440 to 450 MHz would affect amateur radio operators like myself and it would affect the ability of hams to provide needed public service.

It is likely that loss of access would result in more crowding and interference in the part of the band, or in another band, that amateur radio operators use.

Thank you for your attention.

Sincerely,



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RM 9267  
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From: Mary Riddick  
To: FCCMAIL.SMTPNLM("N9OCA@aol.com")  
Date: 6/2/98 5:38pm  
Subject: RM 9267 -Reply

Your comment has been forwarded to the FCC, Secretary's Office for association with Rule Making#9267.

>>> <N9OCA@aol.com> 06/01/98 07:51pm >>>  
Dear Sirs:

I would like to express my opposition to RM 9267. The 70cm band is heavily utilized in my part of Indiana, with several repeaters active in the Michiana area. These repeaters are in constant use for routine communications, as well as for Civil Defense back-up use. In addition, loss of any use of this band would obsolete much current equipment. This would create economic hardship for any manufacturers or dealers carrying inventory, as well as for operators.

Thank you for your consideration.

Myer Blatt, N9OCA

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OFFICE OF THE SECRETARY

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RM 9267

From: Jaime Navarro KE6FPK <bc984@lafn.ORG>  
To: A4.A4 (SSEGAL)  
Date: 6/2/98 11:20pm  
Subject: Comments to the Chairman

Jaime Navarro KE6FPK (bc984@lafn.ORG) writes:

RM9267  
Federal Communications Commission  
Secretary, Room 222  
1919 M Street N.W.  
Washington, D.C. 20554

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JUN - 3 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Commission:

As a licensed Amateur Radio Operator, I would like to go on record as being strongly opposed to the petition under consideration, RM-9267.

I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267 (420 MHz to 430 MHz and 440 MHz to 450 MHz), are very important to our continued success in serving the public and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if Land Mobile Radio became the primary user. In Southern California, this relatively small portion of Spectrum will quickly fill up with bases, mobiles and repeaters assigned to businesses, leaving Amateurs and their established communications ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State and Local Governments by providing my equipment and service during an emergency. RM-9267 will limit the Amateur Radio Operator's access to these frequencies and will definitely interfere with all Amateur Disaster Communication efforts.

Sincerely,

Jaime F. Navarro  
KE6FPK

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Remote host: 206.117.18.8  
Remote IP address: 206.117.18.8

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EUGENE R. P. LEMAN  
23390 Deerfield RD  
LOS GATOS CA.95033  
Tel.408 353 1013  
Fax.408 353 5134  
WAJZN

TO  
RM 9267  
Secretary  
Federal Communications Commission  
1919 M Street  
Washington, DC 205554

Hello

I operate a repeater on 440 650 Mhz at a location in the  
Santa Cruz mountains CA.

Over the years we have had our share of forest fires,  
earthquakes and floods not to mention medical emergencies and  
car crashes.

The repeater is used by over 30 users, if RM 9267 is  
approved, it would have a major negative impact on our  
remote mountain community.

73's

Eugene Leman  
WA6JZN

*Eugene Leman*

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